

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

Mary Douglas
Kalamazoo District Supervisor
Michigan Department of Environmental Quality
7953 Adobe Road
Kalamazoo, Michigan 49009

Dear Ms. Douglas:

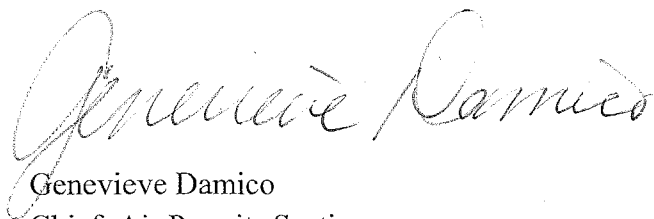
The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (ROP) renewal for Entergy Nuclear Palisades, State Registration Number B2934, located in Covert, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comment.

The draft permit contains only general, high level citations for several applicable Federal standards, as listed in the table below. The Michigan Department of Environmental Quality (MDEQ) should include the detailed applicable requirements from these standards in the ROP. The applicable Title V operating permit regulations at 40 C.F.R. §70.6 require that a permit include emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance. EPA's March 5, 1996 White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program provides clarifying guidance regarding the incorporation of applicable regulations into a Title V permit.

Units/Flexible Groups	Federal Standard
EUOFFICEBLR FGBOILERS	Industrial, Commercial and Institutional Boilers Area Source MACT, 40 CFR Part 63 Subpart JJJJJ
EUGEN3 EUSECURITYGEN FGEMERG-EXRICE FGGENS1&2	Reciprocating Internal Combustion Engines MACT, 40 CFR Part 63 Subpart ZZZZ
EUGEN3 EUSECURITYGEN	Stationary Compression Ignition Internal Combustion Engines NSPS, 40 CFR Part 60 Subpart IIII

We appreciate the opportunity to provide comments on this draft permit, and we would like to work with MDEQ to address these permit content requirements on a statewide basis. If you have any questions, please contact me or Beth Valenziano, of my staff, at (312) 886-2703.

Sincerely,

A handwritten signature in cursive script, reading "Genevieve Damico". The ink is dark and the signature is fluid, with a large initial "G".

Genevieve Damico
Chief, Air Permits Section